

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

PRIME HEALTHCARE SERVICES – SAINT
CLARE’S LLC d/b/a SAINT CLARE’S HEALTH,

Defendant.

Civil Action No.: 2:21-CV-02055-
MCA-AME

JOINT MOTION TO APPROVE CONSENT DECREE

Plaintiff United States Equal Employment Opportunity Commission (“EEOC”) and Defendant Prime Healthcare Services - Saint Clare’s LLC d/b/a Saint Clare’s Health (“Saint Clare’s Health”) have engaged in comprehensive settlement negotiations and have agreed that the above-captioned action should be resolved by entry of the proposed Consent Decree attached to this motion for the reasons stated therein. The Parties respectfully move this Court to approve and enter the attached Consent Decree.

Dated: Newark, New Jersey
March 2, 2022

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

/s/ Edumin Corrales

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SAINT CLARE’S HEALTH

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